

UNITED STATES OF AMERICA	:	CRIMINAL NO.:	_____
v.	:	DATE FILED	: _____
KENNETH BAGLEY	:	VIOLATIONS	: 18 U.S.C. § 1951 (a) (Interference with commerce by robbery - 7 Counts) 18 U.S.C. § 2113(a) (Bank robbery - 1 Count)

COUNT ONE

1. On or about January 26, 2003, the Wawa convenience store, located at 518 South Second Street in Philadelphia, Pennsylvania, was engaged in the retail sale of fast food, cigarettes, and packaged goods in interstate commerce and was an enterprise which affected interstate commerce.

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obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, by robbery, in that, the defendant unlawfully took and obtained property, specifically, approximately \$100 cash, from the person and presence of an employee of the Wawa convenience

store, and against her will, by means of actual and threatened force, and violence, and fear of injury, immediate and future, to her person and property, and property in her custody and possession belonging to the Wawa convenience store, that is, by threatening the employee with what appeared to be a gun and otherwise threatening the employee of the Wawa convenience store.

All in violation of Title 18, United States Code, Section 1951(a).

COUNT TWO

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. On or about February 2, 2003, the Office Max office supply store, located at 200 South Swanson Street in Philadelphia, Pennsylvania, was engaged in the retail sale of office supplies in interstate commerce and was an enterprise which affected interstate commerce.

2. On or about February 2, 2003, at Philadelphia, in the Eastern District of Pennsylvania, defendant

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obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, by robbery, in that, the defendant unlawfully took and obtained property, specifically, approximately \$40 cash, from the person and presence of an employee of the Office Max office supply store, and against her will, by means of actual and threatened force, and violence, and fear of injury, immediate and future, to her person and property, and property in her custody and possession belonging to the Office Max office supply store, that is, by threatening the employee with what appeared to be a gun and otherwise threatening the employee of the Office Max office supply store.

All in violation of Title 18, United States Code, Section 1951(a).

COUNT THREE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

On or about February 2, 2003, at Philadelphia, in the Eastern District of
Pennsylvania, defendant

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knowingly and unlawfully by force and violence, and by intimidation, took from employees of the
Commerce Bank, lawful currency of the United States, that is, approximately \$600, belonging to,
and in the care, custody, control, management and possession of the Commerce Bank, the
deposits of which were insured by the Federal Deposit Insurance Corporation.

All in violation of Title 18, United States Code, Section 2113(a).

COUNT FOUR

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. On or about February 3, 2003, the Dollarland variety store, located at 2715 South Front Street in Philadelphia, Pennsylvania, was engaged in the retail sale of miscellaneous items in interstate commerce and was an enterprise which affected interstate commerce.

2. On or about February 3, 2003, at Philadelphia, in the Eastern District of Pennsylvania, defendant

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obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, by robbery, in that, the defendant unlawfully took and obtained property, specifically, approximately \$104 cash, from the person and presence of an employee of the Dollarland variety store, and against her will, by means of actual and threatened force, and violence, and fear of injury, immediate and future, to her person and property, and property in her custody and possession belonging to the Dollarland variety store, that is, by threatening the employee with what appeared to be a gun and otherwise threatening the employee of the Dollarland variety store.

All in violation of Title 18, United States Code, Section 1951(a).

COUNT FIVE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. On or about February 5, 2003, the McDonald's restaurant, located at 5945 Woodland Avenue in Philadelphia, Pennsylvania, was engaged in the retail sale of fast food and was an enterprise which affected interstate commerce.

2. On or about February 5, 2003, at Philadelphia, in the Eastern District of Pennsylvania, defendant

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obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, by robbery, in that, the defendant unlawfully took and obtained property, specifically, approximately \$100 cash, from the person and presence of an employee of the McDonald's restaurant, and against her will, by means of actual and threatened force, and violence, and fear of injury, immediate and future, to her person and property, and property in her custody and possession belonging to the McDonald's restaurant, that is, by threatening the employee with what appeared to be a gun and otherwise threatening the employee of the McDonald's restaurant.

All in violation of Title 18, United States Code, Section 1951(a).

COUNT SIX

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. On or about February 6, 2003, the 7-Eleven convenience store, located at 2144 Lombard Street in Philadelphia, Pennsylvania, was engaged in the retail sale of fast food, cigarettes, and packaged goods and was an enterprise which affected interstate commerce.

2. On or about February 6, 2003, at Philadelphia, in the Eastern District of Pennsylvania, defendant

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attempted to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, by robbery, in that, the defendant attempted unlawfully to take and obtain property, specifically, money, from the person and presence of an employee of the 7-Eleven convenience store, and against his will, by means of actual and threatened force, and violence, and fear of injury, immediate and future, to his person and property, and property in his custody and possession belonging to the 7-Eleven convenience store, that is, by threatening the employee with what appeared to be a gun and otherwise threatening the employee of the 7-Eleven convenience store.

All in violation of Title 18, United States Code, Section 1951(a).

COUNT SEVEN

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. On or about February 6, 2003, the Mobil convenience store, located at 4400 City Line Avenue in Philadelphia, Pennsylvania was engaged in the retail sale of gasoline, fast food, cigarettes, and packaged goods and was an enterprise which affected interstate commerce.

2. On or about February 6, 2003, at Philadelphia, in the Eastern District of Pennsylvania, defendant

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obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, by robbery, in that, the defendant unlawfully took and obtained property, specifically, approximately \$174 cash, from the person and presence of an employee of the Mobil convenience store, and against his will, by means of actual and threatened force, and violence, and fear of injury, immediate and future, to his person and property, and property in his custody and possession belonging to the Mobil convenience store, that is, by threatening the employee with what appeared to be a gun and otherwise threatening the employee of the Mobil convenience store.

All in violation of Title 18, United States Code, Section 1951(a).

COUNT EIGHT

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. On or about February 8, 2003, the Wawa convenience store, located at 801 Conshohocken State Road in Bala Cynwyd, Pennsylvania, was engaged in the retail sale of fast food, cigarettes, and packaged goods in interstate commerce and was an enterprise which affected interstate commerce.

2. On or about February 8, 2003, at Bala Cynwyd, in the Eastern District of Pennsylvania, defendant

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obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, by robbery, in that, the defendant unlawfully took and obtained property, specifically, approximately \$150 cash, from the person and presence of an employee of the Wawa convenience store, and against her will, by means of actual and threatened force, and violence, and fear of injury, immediate and future, to her person and property, and property in her custody and possession belonging to the Wawa convenience store, that is, by threatening the employee with what appeared to be a gun and otherwise threatening the employee of the Wawa convenience store.

All in violation of Title 18, United States Code, Section 1951(a).

PATRICK L. MEEHAN
United States Attorney

